1 N. DENISE TAYLOR - State Bar No. 101434 JENNIFER A. SCHER - State Bar No. 244363 2 DEAN J. SMITH - State Bar No. 130369 TAYLOR BLESSEY LLP 350 S. Grand Avenue, Suite 3850 Los Angeles, CA 90071 Telephone: (213) 687-1600 3 4 Facsimile: (213) 687-1620 5 dtaylor@taylorblessey.com ischer@taylorblessey.com 6 Attorneys for Objector/Defendant, 7 JUDICIAL WATCH, INC. 8 9 UNITED STATES DISTRICT COURT 10 CENTRAL DISTRICT OF CALIFORNIA 11 LARRY KLAYMAN. 12 CASE NO.: 14-cv-1602 ABC (ASx) 13 REQUEST FOR JUDICIAL NOTICE Plaintiff, IN SUPPORT OF OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL 14 COMPLIANCE WITH SUBPOENA TO v. 15 ORLY TAITZ 16 Date: April 7, 2014 JUDICIAL WATCH, Time: 10:00 a.m. Crtrm: "680" 17 Defendant. 18 19 20 TO THE ABOVE-ENTITLED COURT AND TO PLAINTIFF, LARRY 21 KLAYMAN, PRO SE: 22 Defendant, JUDICIAL WATCH, INC. ("Judicial Watch"), requests the Court to 23 24 take judicial notice of the following Documents, submitted in opposition to Plaintiff's 25 Motion to Compel Compliance with Subpoena to Orly Taitz: 26 /// 27 28 ///

REQUEST FOR JUDICIAL NOTICE IN OPPOSITION TO MOTION OF PLAINTIFF, LARRY KLAYMAN, TO COMPEL COMPLIANCE WITH SUBPOENA TO ORLY TAITZ

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- 1. The Complaint in Klayman v. Judicial Watch, Inc., filed in the United States District Court, Southern District of Florida, Case No. 13-cv-20610, attached to the Memorandum of Points and Authorities in Opposition to the Motion to Compel, as Exhibit 1.
- 2. The Order Setting Trial and Pre-Trial Schedule, Requiring Mediation, and Referring Certain Matters to Magistrate Judge, filed in the United States District Court, Southern District of Florida, Case No. 13-cv-20610, attached to the Memorandum of Points and Authorities in Opposition to the Motion to Compel, as Exhibit 2.
- 3. The Notice of Deposition issued in the United States District Court, Southern District of Florida, Case No. 13-cv-20610, attached to the Memorandum of Points and Authorities in Opposition to the Motion to Compel, as Exhibit 3.
- The Local Rules of the United States District Court for the Southern 4. District of Florida, Rule 26.1(i), attached to the Memorandum of Points and Authorities in Opposition to the Motion to Compel, as Exhibit 5.
- 5. The Amended Order Following Discovery Conference, filed in the United States District Court, Southern District of Florida, Case No. 13-cv-20610, attached to the Memorandum of Points and Authorities in Opposition to the Motion to Compel, as Exhibit 6.
- 6. The Subpoena issued by the United States Central District of California, in the action entitled Klayman v. Judicial Watch, with the Southern District of Florida

case number, attached to the Memorandum of Points and Authorities in Opposition to the Motion to Compel, as Exhibit 7. DATED: March 17, 2014 TAYLOR BLESSEY LLP N. DENISE TAYLOR JENNIFER A. SCHER Attorneys for Objector/Defendant, JUDICIAL WATCH. INC.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 350 South Grand Avenue, Suite 3850, Los Angeles, California 90071.

On March 17, 2014, I served the foregoing document(s) described as REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA TO ORLY TAITZ on interested parties in this action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

- (BY MAIL) I deposited such envelope(s) in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury that the above is true and correct.

Executed on March 17, 2014, at Los Angeles, California.

Maggie Bravo
Type or Print Name
Signature

SERVICE LIST Klayman v. Judicial Watch, et al. CD Cal. Case No. 14-cv-1602 So. Dist. Fl. Case No. 13-cy-20610 LARRY KLAYMAN, ESQ. **Plaintiff** 2520 Coral Way, Suite 2027 Miami, FL 33145 Telephone: (310) 595-0800 Email: leklayman@gmail.com Orly Taitz 29839 Santa Margarita Pkwy. Racho Santa Margarita, CA 92688 Non-Party Deponent Attorneys for Defendant, JUDICIAL WATCH, INC. **DOUGLAS JAMES KRESS** Schwed Kahle & Jenks, P.A. 11410 North Jog Road Palm Beach Gardens, FL 33418 Email: dkress@schwedpa.com (Courtesy Copy)

REQUEST FOR JUDICIAL NOTICE IN OPPOSITION TO MOTION OF PLAINTIFF, LARRY KLAYMAN, TO COMPEL COMPLIANCE WITH SUBPOENA TO ORLY TAITZ